

*The Law Office of*

**Rehan Nazrali, Esq.**

299 Broadway 17th Floor ▪ New York, NY 10007 ▪ Tel: (646) 331-9378 ▪ Fax: (646) 572-8768  
email: rnazraliesq@gmail.com

September 9, 2024

**VIA ECF**

The Honorable Kimba M. Wood  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: Nkansah v. United States of America, 18-cv-10230 (PAC) (SLC)

Dear Judge Wood:

The Plaintiff replies to the Defendant's opposition to Plaintiff's request to have any future deposition of Cassandra Synder be determined and conditioned on and by medical clearance. Given the report from Clinical Associates of Ms Synder's mental health previously provided to the government, wherein her mental health provider, Mary Kay, explicitly set forth that: "Cassandra was referred to counseling after screening positive *for* both anxiety and depression following a recent miscarriage" (September 18, 2024), defense counsel's assertion that Ms Synder's miscarriage is not attributable to the deposition is not an accurate representation of clinically findings.

Regarding a future timeline for depositions of Ms Synder, her health care provider says the following: "due to her [Ms Synder's] fragile mental health and recent miscarriage, at this time I have significant concerns that her participation in the deposition process would be detrimental to her mental health and wellbeing. This could potentially cause further decompensation and psychiatric instability."

Accordingly, Plaintiff reiterates that Ms Synder has suffered a significant breakdown of psychological stability and as such any future deposition should only occur where she has been medically cleared to appear for the same as recommended by her mental health provider.

/S/

Rehan Nazrali Esq

cc: (via ECF) Carly Wienreb, Counsel for Defendant